



CITY OF

PORTLAND, OREGON

BUREAU OF ENVIRONMENTAL SERVICES

DR 1398
9-13-84

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Mike Lindberg, Commissioner
John Lang, Administrator
1120 S.W. 5th Ave.
Portland, Oregon 97204-1972
(503) 796-7169

FILE
COPY

September 13, 1984

Stanley A. West - Area Operations Manager
Van Walters & Rogers
P.O. Box 10287
Portland, Oregon 97210

Re: SPCC Plan

Dear Mr. West:

This office has completed its review of the SPCC plan for your facility at 3950 NW Yeon Ave. I apologize for my delay in replying to this document.

Listed below are my comments to those portions of the plan which I feel impact the City sewer system and wastewater treatment plant. I have not attempted to judge the plan for completeness in the area of public safety because that responsibility rests with others.

Plan Section - Title

Comment

#4 - Outside Agency Coordinator List:

This should be corrected to read
"PORTLAND PUBLIC WORKS DEPARTMENT -
N. Columbia Blvd. Wastewater
Treatment Plant"

#8 - On Site Spill Plan:

Item #8 needs clarification. It could be interpreted to mean that "incompatible" materials should be disposed in sewer.

#8 - Emergency Procedures:

Instructions should be added requiring spill response personnel to close all shut-off valves on drain lines to the City sewer unless directed otherwise by the Fire Bureau or equal authority.

Page Two

#10 - Spill Reporting:

To protect the treatment plant and sewer system in the event of a chemical release into the City's 42" combination storm and sanitary sewer serving VWR, please add the Columbia Blvd. Wastewater Treatment Plant operator (285-0205 and 285-0206) to the list of agencies to be notified.

#10 - Reportable Quantities:

In certain cases the City will require the reporting of smaller quantities of hazardous and toxic chemicals than those prescribed by 40 CFR 117.3. This will apply specifically to those materials classified as group "C" and "D" materials in the federal regulations as listed in Exhibits B & C in this section. For "C" and "D" materials the reportable quantity (RQ) to the City is 250 pounds. RQ's for those materials classified "X", "A", and "B" are acceptable as noted.

#11 - Emergency Equipment List:

Missing

#12 - Maps/Diagrams:

Shut-off valves need to be installed on the 6" CSP and 12" CSP branch lines shown on Dwg. No. 5 to the City's 42" combination storm and sanitary sewer. The same applies to the private 6" sanitary sewer shown on Dwg. No. 4.

I would appreciate your feedback on these comments since they will affect the language of your City industrial wastewater discharge permit scheduled for drafting in the near future. Please give me a call at any time (796-7125).

Yours very truly,



Harry G. Edmonds, P.E.
Industrial Waste Manager

HGF:11d